

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

ANTONIO DORAN CHANDLER

Case: 2:20-mj-30402

Assigned To : Unassigned

Assign. Date : 9/25/2020

CMP: USA v CHANDLER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 24, 2020 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. 922(g)(3)

Unlawful user of a controlled substance in possession of a firearm

This criminal complaint is based on these facts:

See attached AFFIDAVIT.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: September 25, 2020

City and state: Detroit, Michigan

*Complainant's signature*

Brett J. Brandon, Special Agent (ATF)

Printed name and title*Judge's signature*

Hon. Elizabeth A. Stafford, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Brett J. Brandon, being first duly sworn, hereby state:

1. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), assigned to the Detroit Field Division, since July 2013. I graduated from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment with ATF, I have conducted or participated in numerous criminal investigations involving the illegal possession, use, and sale of firearms, drug trafficking violations, and criminal street gangs.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. ATF is investigating ANTONIO DORAN CHANDLER (B/M; DOB: XX/XX/2000) for violating 18 U.S.C. § 922(g)(3) (unlawful user of a controlled substance in possession of a firearm), among other state and federal criminal violations.

4. On September 23, 2020, I swore to and obtained a sealed federal search warrant from United States Magistrate Judge Elizabeth A. Stafford for a Pen Register/Trap and Trace, E-911 and geolocation information, and call detail records (CDR) associated with the Target Cellular Device assigned dialed number (313) 715-9320. I obtained the warrant in an effort to locate CHANDLER and the Target Cellular Device and recover evidence of the subject offense.

5. Later that same date, ATF Intelligence Research Specialist Michael Malone served the federal search warrant on Sprint. Intelligence Research Specialist Malone reviewed the phone records obtained from Sprint dating from April 2020 to September 24, 2020. During that time, CHANDLER's most frequently contacted number was a phone number subscribed to Raionna Nicole Hunt II. Ms. Hunt's current address according to the Michigan Secretary of State is 11651 14th Street, Apartment 201, in Detroit, Michigan. Intelligence Research Specialist Malone reviewed CHANDLER's most frequently contacted cellular tower from April 2020 through September 24, 2020, including the overnight hours, and identified a tower that covers an area including 11651 14th Street.

6. On September 24, 2020, at approximately 10:58 a.m., the GPS ping information confirmed that the Target Cellular Device was present in the area of 11651 14th Street. At approximately 11:00 a.m., I observed two black females exit the common entrance door leading to 11651 14th Street, Apartment 201. Shortly

thereafter, a short black male, approximately 5'1" to 5'4" wearing orange and blue shoes, sweatpants, and a blue object on his head, exited the common entrance door with another black male and a small black female child. The individuals interacted with the two black females, who subsequently departed. Immediately thereafter, the short black male in the orange and blue shoes entered the driver's seat of a silver Ford Explorer with rear end damage and a Michigan temporary license plate. The other black male and small black female child also got into the Explorer.

7. At that time, I drove past the Explorer and made eye contact with the driver, who had removed the blue object from his head, revealing a wavy unkempt afro type hairstyle. I recalled observing an Instagram Live Video posted by Instagram User ID "glizzytone" at approximately 6:30 p.m. on September 23, 2020, which showed CHANDLER wearing a blue hat with similar hair. I also recalled observing an Instagram story posted by "glizzytone" wearing orange and blue shoes identical to the ones I observed the driver of the Explorer wearing. I surveilled the Explorer as it turned around on 14th Street, southwest on Webb Street, and north on LaSalle Street before discontinuing the surveillance. At approximately 11:19 a.m., the GPS ping information confirmed that the Target Cellular Device was no longer in the area of 11651 14th Street.

8. Earlier in September 2020, I reviewed the Instagram Profile associated with Instagram User ID "glizzytone." I reviewed "stories" (short videos

or images that can be posted to an Instagram user's account and displayed publically or to the user's followers in a private account), and other images and videos posted by "glizzytone." I compared the individual depicted and held out as "glizzytone" to Image 8a, a Michigan Secretary of State image of CHANDLER dated November 20, 2018. I identified CHANDLER as the individual depicted in the images and videos and determined that he accessed and utilized the account. For an example, see Image 8b posted by "glizzytone" on June 29, 2020, depicting CHANDLER holding what appear to be two pistols.



Image 8a



Image 8b

9. On September 24, 2020, at approximately 12:30 p.m., Instagram User ID "glizzytone" started a live video. In the video, CHANDLER is seen holding

what appears to be an AR-type firearm and smoking what appears to be a marijuana blunt. See Image 9a for a screen capture taken from the video.



Image 9a

10. The GPS and Pen Register information at the time of the video and immediately thereafter placed the Target Cellular Device in the area of Groesbeck Highway and Collingham Drive in Detroit, Michigan. At approximately 1:00 p.m., law enforcement personnel from the ATF Crime Gun Enforcement Team and the Detroit Police Department responded to the area and located the above-referenced silver Ford Explorer parked in the driveway of 19932 Waltham Street in Detroit, Michigan.

11. At approximately 2:45 p.m., the law enforcement personnel observed the Explorer back out of the driveway and drive north on Waltham Street. A

Detroit Police Department marked unit conducted a traffic stop and identified the driver as CHANDLER and another individual as the front passenger.

12. The law enforcement personnel subsequently obtained the homeowner's consent to search 19932 Waltham Street in Detroit, Michigan and recovered the following items from the basement: one Anderson Manufacturing AM-15 multi-caliber firearm bearing serial number "20091683," one thirty-round magazine containing thirteen rounds of ammunition, one partially smoked marijuana blunt, one unopened container of commercially packaged marijuana, and several empty containers of commercially packaged marijuana. See Image 12a for a photograph of the firearm.



Image 12a

13. I sent an image of the firearm to ATF Firearms and Ammunition Technology Division (FATD) Firearms Enforcement Officer James Barlow, who

advised that the firearm appeared to be a short barrel rifle as defined in 26 U.S.C. § 5845(a) due to the “brace” attached to the firearm; he could not, however, make a determination without physically examining the firearm.

14. I also contacted ATF Interstate Nexus Expert Special Agent Michael Jacobs and provided a verbal description of the firearm. Based upon the verbal description, Special Agent Jacobs advised that the Anderson Manufacturing AM-15 multi-caliber firearm is a firearm as defined under 18 U.S.C. § 921 and manufactured outside of the state of Michigan after 1898, and therefore had traveled in and affected interstate commerce.

15. Special Agent Nicholas Mascorro and I conducted a post-Miranda audio-recorded interview of CHANDLER on scene. During the interview, CHANDLER admitted to smoking marijuana in the basement of the searched residence and taking the live video described above in which he possessed the firearm.

16. In addition, Instagram posts by User ID “glizzytone” between September 12, 2020 and September 23, 2020 show CHANDLER possessing and in some instances using what appear to be marijuana and Oxycodone Hydrochloride, Schedule I and Schedule II Controlled Substances, respectively.

17. On September 12, 2020, Instagram User ID “glizzytone” posted a video to the user’s story depicting the user holding what appears to be a bag of

“Pink Runtz” marijuana. I am aware based on training and experience involving the possession and use of controlled substances that “Pink Runtz” is a strain of marijuana. The time 9:07 p.m. is displayed over the image. Based on the time of the screen capture, the time is consistent with the time of the post. See Image 17a for a screen capture.



Image 17a

18. Also on September 12, 2020, Instagram User ID “glizzytone” posted a video to the user’s story depicting two white pills with “10 325” and “RP” imprinted on the pills. The words “Woww finna be dead” were displayed over the image. I queried Drugs.com and identified the pills as Oxycodone Hydrochloride 325 mg/10 mg. I know that the phrase “dead” is commonly used by users of

controlled substances, specifically prescription pills, to refer to the physiological experience of taking the substance. See Image 18a for a screen capture.



Image 18a

19. Also on September 12, 2020, Instagram User ID “glizzytone” also posted a video to the user’s story depicting the user holding what appears to be a commercial Ziploc bag containing marijuana with the word “Cookie” displayed over the image. The time 1:54 p.m. is displayed over the image. Based on the time of the screen capture, the time is consistent with the time of the post. I am aware based on training and experience involving the possession and use of controlled substances that “Cookie” is a strain of marijuana. See Image 19a for a screen capture.

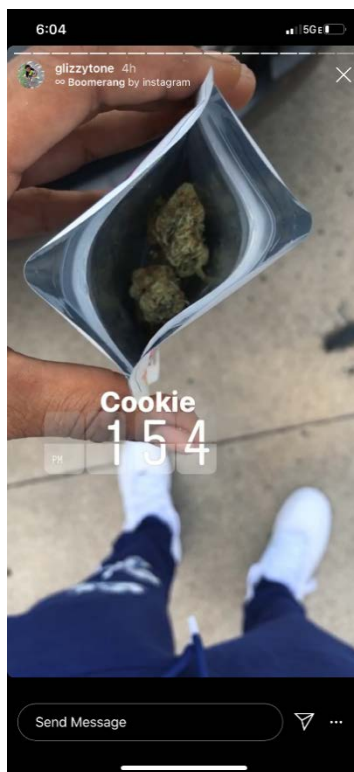


Image 19a

20. On September 13, 2020, Instagram User ID “glizzytone” posted a video to the user’s story depicting the user holding what appears to be a plastic bag containing marijuana with the word “Crack” displayed over the image. I know based on training and experience involving the possession and use of controlled substances that “Crack,” specifically “Green Crack,” is a strain of marijuana. See Image 20a for a screen capture.

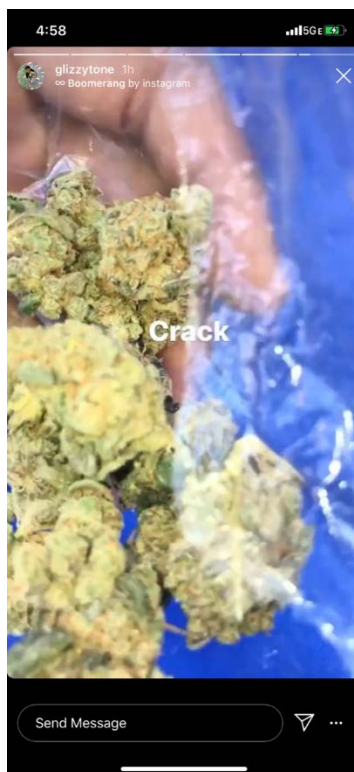


Image 20a

21. On September 16, 2020, Instagram User ID “glizzytone” posted a video to the user’s story depicting the user holding what appears to be a white pill with the letters “RP” inscribed on the pill (previously identified as Oxycodone Hydrochloride 325 mg/10 mg). The time 9:22 p.m. is displayed over the image. Based on the time of the screen capture, the time is consistent with the time of the post. See Image 21a for a screen capture.



Image 21a

22. On September 19, 2020, Instagram User ID “glizzytone” posted a video to the user’s story depicting what appears to be a white pill with “10/325” inscribed on the pill (previously identified as Oxycodone Hydrochloride 325 mg/10 mg) on top of blue clothing. The time 3:24 p.m. is displayed over the image. Based on the time of the screen capture, the time is consistent with the time of the post. See Image 22a for a screen capture.



Image 22a

23. On September 21, 2020, Instagram User ID “glizzytone” posted a video to the user’s story depicting CHANDLER holding what appears to be a Century Arms Micro Draco AK-pistol and smoking what appears to be a marijuana blunt. See Image 23a for a screen capture.



Image 23a

24. I also physically reviewed a cell phone pursuant to a federal search warrant following its seizure during the execution of a federal search warrant at JEREMY MASSEY JR.'s residence. MASSEY is an associate of CHANDLER.

25. On August 5, 2020, at 9:59 p.m., the seized cell phone captured a video of CHANDLER seated in the backseat of a car appearing to be disoriented and high, with the words "Perk Land" and three crying laughing emojis displayed over the image.

26. On August 8, 2020, Instagram User ID "glizzytone" sent the user of the seized cell phone a direct message stating "I'm off this perc." I know that

“Percocet” is the brand name for Oxycodone-Acetaminophen, similar to the prescription pills depicted above, and is a Schedule II Controlled Substance.

CONCLUSION

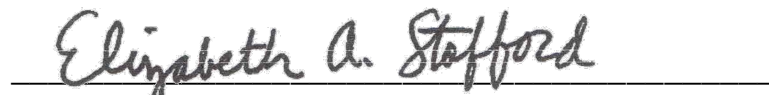
27. There is probable cause to believe that on September 24, 2020, in the Eastern District of Michigan, CHANDLER, an unlawful user of controlled substances, namely marijuana and Oxycodone, did knowingly and intentionally possess a firearm that had travelled in and affected interstate commerce, in violation of 18 U.S.C. § 922(g)(3).

Respectfully submitted,



Brett J. Brandon
ATF Special Agent

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Elizabeth A. Stafford
United States Magistrate Judge

Dated: September 25, 2020